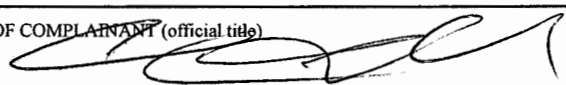


United States District Court		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA v. Heather Lane Shymeka Miller		DOCKET NO. MAGISTRATE'S CASE NO. <div style="font-size: 1.5em; font-family: cursive;">15-m-832</div>	
<div style="font-size: 1.5em; font-weight: bold;">FILED</div> JUL 22 2015 MICHAEL E. KUNZ, Clerk By _____ Dep. Clerk			
Complaint for violation of Title 18 United States Code §§ 2113(a) and 2			
NAME OF JUDGE OR MAGISTRATE Honorable Jacob P. Hart		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE 7/15/15	PLACE OF OFFENSE Philadelphia, PA	ADDRESS OF ACCUSED (if known)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: <p>On or about July 15, 2015, at Philadelphia, in the Eastern District of Pennsylvania, defendant, knowingly and unlawfully by force and violence, and by intimidation, took from employees of the TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, money, that is, currency of the United States, belonging to and in the care, custody, control, management, and possession of the bank, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), and aided and abetted the same.</p>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: SEE AFFIDAVIT ATTACHED HERETO.			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title)  Charles Kincaid OFFICIAL TITLE Special Agent, Federal Bureau of Investigation ("FBI")	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE ⁽¹⁾ Honorable JACOB P. HART, United States Magistrate Judge		DATE <div style="font-size: 1.5em; font-family: cursive;">7-22-15</div>	

1) See Federal Rules of Criminal Procedure rules 3 and 54.

FILED

15.m.832

JUL 22 2015

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Charles Kincaid, Special Agent, Federal Bureau of Investigation (FBI), being duly sworn, state the following:

INTRODUCTION

I have been employed as a Special Agent with the FBI since September 13, 2009, and am currently assigned to the Philadelphia Division. Since August 1, 2012, I have been assigned to the Violent Crime Task Force (VCTF), and prior, I was assigned to the Health Care Fraud Squad. My current duties include, among other things, the investigation of bank robberies, in violation of Title 18 United States Code 2113(a) and (d), and the brandish, use and carry of a firearm during and in relation to a crime of violence, in violation of Title 18 United States Code 924(c).

I submit this affidavit in support of complaints and arrest warrants for David Thomas (*also known as David Thompson*), Heather Lane and Shymeka Miller. The affidavit is based upon information I have learned through investigation, training and experience, as well as, information obtained from various sources including documents, reports, conversations with other law enforcement officers and witnesses who have personal knowledge of the events and circumstances described herein. I have not included every fact known to me concerning this investigation; rather, I have included only those facts that I believe are necessary to establish probable cause to support the issuance of an arrest warrant.

PROBABLE CAUSE STATEMENT

1. On or about July 15, 2015, TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, was robbed at gunpoint by two actors, an unknown male and an unknown female. The male actor forced a bank employee behind the teller counter and brandished a silver firearm in an attempt to conduct a robbery, but the employee was unable to open a drawer. The actor, having no success with the first employee, approached the victim teller and demanded currency. The victim teller opened the drawer at his/her station and the male actor removed the proceeds, and a dye pack, into a dark colored trash bag provided to him by the unknown female. The male and the female actors fled the bank together on foot heading northbound on Ridge Avenue.

2. Minutes after the robbery, officers from Philadelphia Police Department observed a female that fit the description from the bank robbery, walking northbound on Ridge Avenue and carrying a bag. The female was stopped for investigation and identified as Heather Lane, who allowed officers to look in the bag which contained currency that had been stained with red dye. Lane was arrested and transported to the Philadelphia Division of the FBI.

3. While Heather Lane was stopped for investigation, a Philadelphia Police Department Officer conducted a traffic stop on a suspicious vehicle (2006 dark blue Chevrolet Impala, Pennsylvania license plate JWC-4264) just north of Lane's position on Ridge Avenue. The occupants provided identification for a male, David Thomas, and a female, Shymeka Miller. The vehicle and its occupants were released after investigation yielded no further immediate leads on the two.

4. Members of the FBI VCTF responded to the bank robbery and retrieved surveillance video of the actors and the vehicle they fled to after the robbery. The actors fled the bank on foot to the vehicle which was parked approximately a block north on Seville Street. The vehicle turned right from Seville Street onto Ridge Avenue and appeared to proceed north with three occupants. The vehicle was determined to be the same one that was stopped by the officer mentioned above. A photograph of David Thomas was obtained and he resembled the male actor in the still photographs from the robbery.

5. Heather Lane confessed to participating in the robbery after being administered her *Miranda* rights at the Philadelphia Division of the FBI. Lane stated she drove the vehicle to the location and David Thomas and Shymeka Miller conducted the robbery. Thomas and Miller met Lane on Seville Street after the robbery, and the three fled northbound on Ridge Avenue in the vehicle. Lane exited the vehicle shortly after it began traveling northbound on Ridge Avenue to retrieve the bag of currency. She explained that Thomas and Miller had discarded the bag after they realized a dye pack had exploded in the bag. She retrieved the bag and was returning to the vehicle when she was stopped by Philadelphia Police. Lane stated she was not aware of Thomas carrying or using a firearm. She stated she participated in the robbery with the other two because, "...we all needed cash."

6. The information gathered regarding David Thomas was disseminated to the Philadelphia Police Department and surveillance was conducted for the vehicle. Officers were able to locate the vehicle and Thomas, who was sitting in the driver's seat, in the vicinity of 3100 Reach Street, Philadelphia, Pennsylvania. Thomas was arrested and transported to the Philadelphia Division of the FBI on July 15, 2015. The vehicle was seized and transported to a Philadelphia Police facility.

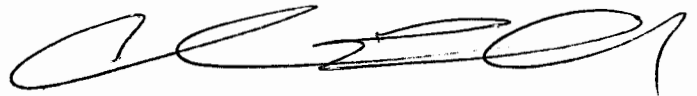
7. David Thomas confessed to participating in the robbery after being administered his *Miranda* rights at the Philadelphia Division of the FBI. He stated that Heather Lane and Shymeka Miller had participated in the robbery. Lane drove them to the robbery location while he and Miller conducted the robbery. While fleeing northbound on foot to Seville Street, a dye pack went off in the bag of currency that Miller was carrying and she discarded the bag just south of Seville Street. As they attempted to make their escape from the scene in the vehicle, Thomas instructed Lane to get out of the vehicle to retrieve the bag of currency. Thomas admitted that the firearm used in the robbery was on the left side of his trunk in the vehicle he had been arrested in earlier that day.

8. Philadelphia Police Department received a search warrant for the vehicle in which David Thomas was arrested. A Walther Mod 8 semiautomatic firearm, serial number 6469, was found on the left side of the trunk of the vehicle, loaded with six .25 caliber rounds. One round was in the chamber of the firearm and the five others were contained in a magazine inserted into the weapon.

9. TD Bank is federally insured by the Federal Deposit Insurance Corporation.

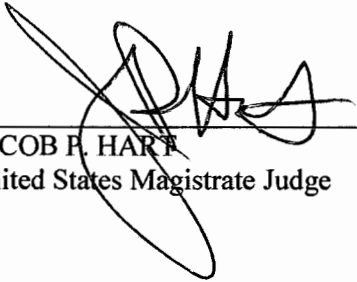
CONCLUSION

10. Due to the above facts, your affiant believes there is probable cause to charge David Thomas, a/k/a David Thompson with bank robbery, in violation of 18 United States Code sections 2113(a) and (d) and brandishing, using and carrying a firearm during and in relation to a crime of violence, in violation of 18 United States Code section 924(c); and Heather Lane and Shymeka Miller with bank robbery, in violation of 18 United States Code sections 2113(a) and 2.



Charles Kincaid
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
this 22 day of July, 2015



JACOB F. HART
United States Magistrate Judge